

June 20, 2023

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

We write today to express our concerns regarding the Department of the Interior's intentions for the Izembek National Wildlife Refuge. Throughout our collective tenures in public service, we have defended Alaska's public lands and the conservation and subsistence values protected under the Alaska National Interest Lands Conservation Act (ANILCA). While we recognize the challenging decisions facing the Department, Izembek Refuge and all of Alaska's over 150 million acres of national conservation lands must be protected for future generations, as Congress intended.

We applauded your decision in March to rescind the 2019 land exchange agreement in the Refuge that would have allowed a road to be constructed through the heart of this pristine Alaskan landscape. In its statement, the Department recognized that this land exchange process was flawed and not consistent with Departmental policy. An exchange of this nature would have set a precedent that any administration may exchange other congressionally protected lands to allow development projects at will. We hoped the withdrawal of this land exchange agreement signaled a commitment to preserving the conservation and subsistence values of the Refuge and all of Alaska's conservation lands.

However, we are troubled by the Department's renewed effort to prepare a Supplemental Environmental Impact Statement to potentially authorize a road in the Izembek Refuge. The Department's Notice of Intent continues to suggest that the Secretary of the Interior has the authority to trade away congressionally designated wilderness to allow roads or other development projects. This action continues to put the integrity of ANILCA, subsistence rights, and all of Alaska's conservation lands at risk. Proceeding in this way could be used as a blueprint for future secretaries to exchange some of our wildest, most ecologically intact lands to allow development and industrialization, eviscerating one of our nation's proudest legislative conservation and environmental justice achievements.

Izembek Refuge is among America's most ecologically significant national wildlife refuges and among the world's most critical wetlands and waterfowl habitats. A road through its biological heart would create significant and irreversible damage, with devastating impacts on wildlife and subsistence hunting and harvesting. In 2013, the Department found that a road through the Izembek Refuge would have "major effects" on Brant and Emperor geese, and would allow greater human access and hunting pressures, displacing the birds from their feeding and nesting areas. If these resources dwindle, so will the traditional hunting and harvesting practices that are central to the culture of Indigenous communities that rely on these resources. Should a precedent be set that land exchanges of some of our wildest lands can be executed by the stroke of a pen,

subsistence resources and ways of life will face significantly more threats and impact hundreds of Alaska Native communities.

We recognize your interest in being responsive to the concerns of the King Cove community, and we are certain there are paths forward that do not undermine ANILCA and the values it sets forth. We respectfully request the Department to pursue alternative non-road options that would accommodate the present and future needs of all peoples that rely on the subsistence use and conservation values of the Refuge.

Sincerely,

Dan Ashe

Director, U.S. Fish and Wildlife Service, 2011-2017

Chief of the National Wildlife Refuge System, U.S. Fish and Wildlife Service, 1998-2003

Bruce Babbitt

Secretary of the Interior, U.S. Department of the Interior, 1993-2001

Don Barry

Assistant Secretary for Fish, Wildlife, and Parks, U.S. Department of the Interior, 1998-2000

Chief Counsel, U.S. Fish and Wildlife Service, 1980-1985

Jamie Rappaport Clark

Director, U.S. Fish and Wildlife Service, 1997-2001

Mike Dombeck

Chief, U.S. Forest Service, 1997-2001

Acting Director, U.S. Bureau of Land Management, 1994-1997

Stuart Eizenstat

Chief White House Domestic Policy Adviser and Executive Director of the White House

Domestic Policy Staff, Carter Administration, 1977-1981

Kim Elton

Senior Advisor to the Secretary for Alaska Affairs, U.S. Department of the Interior, 2009-2012

Kathy Fletcher

Assistant Director of the White House Domestic Policy Staff, Carter Administration, 1977-1981

Geoffrey L. Haskett

Chief of the National Wildlife Refuge System, U.S. Fish and Wildlife Service, 2005-2008

Alaska Regional Director, U.S. Fish and Wildlife Service, 2008-2016

Bob Herbst

Assistant Secretary for Fish, Wildlife, and Parks, U.S. Department of the Interior, 1977-1981

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Director, U.S. National Park Service, 2009-2017

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Secretary of the Interior, U.S. Department of the Interior, 2013-2017

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Chief of the National Wildlife Refuge System, U.S. Fish and Wildlife Service, 2011-2015

Lyle Laverty
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Refuge Manager, Izembek National Wildlife Refuge, U.S. Fish and Wildlife Service, 1995-1998

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Deborah Williams
Special Assistant to the Secretary for Alaska, U.S. Department of the Interior, 1993-1998

Phil Wise
Special Assistant to the President, Carter Administration, 1977-1981